

JON M. HUNTSMAN, JR.

Governor

GARY HERBERT
Lieutenant Governor

Department of Environmental Quality

William J. Sinclair
Acting Executive Director

DIVISION OF WATER QUALITY Walter L. Baker, P.E. Director C/607/041 Incoming C/015/032 & CC'. Steve C.

February 17, 2009

Mr. Bruce Hill, President & CEO Mr. David Shaver, Resident Agent UtahAmerican Energy, Inc. P.O. Box 910 East Carbon, UT 84520-0910

Subject:

Inspection Reports - UPDES Permit Nos. UT0025640 (West Ridge Mine) and

UT0024368 (Crandall Canyon Mine).

Dear Mr. Hill and Mr. Shaver:

On February 3, 2009 I met with you and your authorized agent, Ms. Karla Knoop and conducted Reconnaissance and Compliance Sampling Inspections in regards to your UPDES Permit facilities referenced above. Specifically we discussed the current status and corrective action plans for each facility before sampling the discharging outfalls.

Enclosed are copies of the inspection reports for your records. Please review the "Deficiencies" and "Requirements" sections of each report and contact me with any questions. I appreciate your efforts to facilitate the inspection and keep me informed of the operations. If you have any questions, please contact me at (801) 538-6779 or by e-mail at jstudenka@utah.gov.

Sincerely,

Jeff Studenka, Environmental Scientist

tudenta

UPDES IES Section

Enclosures

cc (w/encl):

Darcy O'Connor, EPA Region VIII

Claron Bjork, SE District Health Department

Dave Ariotti, SE District Engineer

Daron Haddock, Division of Oil Gas & Mines

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United States Environmental Protection Agency Washington, D.C. 20460

Section A: Nation	nal Data System Coding (i.e., I	(CIS)			
Transaction Code NPDES U T 0 0 2 5 6 4 0 11	yr/mo/day	Inspection Type	Inspector Fac. Type 2 2 20		
Remarks 21 66					
Inspection Work Days 1	$ \begin{array}{c c} \mathbf{BI} & \mathbf{QA} \\ N & N \\ \hline 71 & 72 \end{array} $	73 74	Reserved		
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Name and Location of Facility Inspected (For industrial users discharging	to POTW also include POTW name	Entry Time/ Date	Permit Effective Date		
and NPDES permit number)	orony, also include 1 01 w hame	9:25 am/ 2-3-2009	5-1-2006		
West Ridge Resources, West Ridge Mine					
794 North "C" Canyon Road, Carbon County, UT		Exit Time/ Date	Permit Expiration Date		
		10:35 am / 2-3-2009	4-30-2011		
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)		Other Facility Data (e.g.,	SIC NAICS, and other		
Dave Shaver, Resident Agent, West Ridge Mine, (435) 888-4017		descriptive information)	· · · · · · · · · · · · · · · · · · ·		
Karla Knoop, Hydrologist & Authorized Agent, jbr Environmental Consu phone (435) 637-9645, fax (435) 637-8679	Itants, Inc.	Bituminous Coal Unde SIC Code 1222 NAICS 212112	rground Mining Facility		
		SEE ATTACHED	·		
Name, Address of Responsible Official/Title/Phone and Fax Number					
Bruce Hill, President and CEO UtahAmerican Energy, Inc.	Contacted				
P.O. Box 1077					
Price, UT 84501	Yes No				
(435) 888-4000		1			
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Section C: Areas Evaluated Du	ring Inspection (Check only th	ose areas evaluated)			
Permit Self Monitoring Progr	am Pretreatment		MS4		
Records/Reports Compliance Schedule	Pollution Prever	ntion			
Facility Site Review Laboratory	Storm Water				
Effluent/Receiving Waters Operations & Maintenance Combined Sewer Overflow					
Flow Measurement Sludge Handling/Disp	· · · · · · · · · · · · · · · · · · ·				
	Name and the second				
Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)					
SEV Codes SEV Description					
A 0 0 1 2 Numeric Effluent Violations					
					
Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numb	per(s)	Date:		
JEFF STUDENKA, ENVIRONMENTAL SCIENTIST	DWQ				
Des Studentes	(801) 538-6779		2-13-08		
Name and Girman and Maria (CAR)	1000 71 17 17		Deter		
Name and Signature of Management Q A Reviewer MIKE HERKIMER, MANAGER	Agency/Office/Phone and Fax Numb	per(s)	Date:		
UPDES IES SECTION MILE Verkende	(801) 538-6058	·	2/18/08		
EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete			, ,		

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- Toxics Inspection
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- **IU Toxics Inspection** IU Sampling Inspection with Pretreatment

- IU Non-Sampling Inspection with Pretreatment
 - IU Toxics with Pretreatment
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- Storm Water-Construction-Sampling
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- Joint EPA/State Inspectors—EPA Lead J-State Inspector Local Health Department (State) Joint State/EPA Inspectors—State lea

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Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

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Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and I being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

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This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Repots) when discussing the areas evaluated during the inspection.

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United States Environmental Protection Agency Washington, D.C. 20460

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21	Remarks		
Inspection Work Days 2 67 69 Facility Self-Monitoring Evaluation Rating 4 70	$ \begin{array}{c c} \mathbf{BI} & \mathbf{QA} \\ \boxed{N} & \boxed{N} \\ \hline \hline $	73 74	-Reserved
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Name, Address of Responsible Official/Title/Phone and Fax Number		SEE TH THE SEE	
Bruce Hill, President and CEO UtahAmerican Energy, Inc. P.O. Box 1077 Price, UT 84501 (435) 888-4000	Contacted Yes No		
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(Attach additional sheets of narrative and che	ecklists, including Single Even	t Violation codes, as	s necessary)
SEV Codes SEV Description			
Name(s) and Signature(s) of Inspector(s) JEFF STUDENKA, ENVIRONMENTAL SCIENTIST Stories Succession (September 1988)	Agency/Office/Phone and Fax Numb DWQ (801) 538-6779	er(s)	Date:
Name and Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numb	er(s)	Date:
MIKE HERKIMER, MANAGER UPDES IES SECTION MIKE HERKIMER, MANAGER UPDES IES SECTION MIKE HERKIMER, MANAGER UPDES IES SECTION	DWQ (801) 538-6058		2/18/09
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INSPECTION PROTOCOL

UPDES Permit #: UT0025640 - West Ridge Mine

Inspection Type: Reconnaissance Inspection + Compliance Sampling

Inspection Date: February 3, 2009

Weather Conditions: Sunny and mild, $\sim 40^{\circ}$ F.

Jeff Studenka of the Division of Water Quality (DWQ) met with Dave Shaver and Karla Knoop at the UtahAmerican Energy, Inc., West Ridge Mine (West Ridge) facility. The purpose for the site visit was to perform reconnaissance and compliance sampling inspections as a result of recent elevated total iron concentrations and coal fines in the mine water discharge.

FACILITY DESCRIPTION

<u>Location</u>: 794 North "C" Canyon Road, near East Carbon, Utah

Coordinates: Outfall 001 – 39° 36' 45" North latitude, 110° 26' 26" West longitude

Outfall 002 – 39° 36' 58" North latitude, 110° 26' 10" West longitude

Average Flow: ~ 1 MGD (Outfall 002, mine water discharge)

Receiving water: "C" Canyon Ephemeral Drainage → Grassy Trail Creek

<u>Process</u>: Underground coal mining operation utilizing long-wall technology. Water from the mine is conveyed to a below ground collection area, where it is then continuously pumped out of the mine and discharged to the surface via Outfall 002. Surface water runoff is conveyed to an above ground settling pond system with a single discharge point (Outfall 001). Outfall 001 has not discharged to date.

INSPECTION SUMMARY

This reconnaissance inspection was limited to outside the mine where the water collection and distribution systems are exposed. The two outfall locations were observed as well as the receiving waters of "C" Canyon Drainage. At the time of the inspection, the mine water discharge was the only flow in "C" Canyon and the discharge was not observed downstream in Grassy Trail Creek, which was dry. The discharge appeared to be slightly turbid and light gray in color with black coal fines deposited along the edges of the stream channel. As planned, DWQ collected discharge compliance grab samples @ 10:30 am from Outfall 002 for TDS, TSS, total iron, and oil & grease parameters and the results will be compared to the February 2009 DMR as soon as both are available. Photos were also collected and are attached herein with a photo log.

OBSERVATIONS

As noted above, the discharge appeared to be slightly turbid and light gray in color with black coal fines deposited along the edges of the stream channel downstream beyond the mining permit boundary.

DEFICIENCIES

Numeric effluent concentrations for total iron have exceeded the daily maximum permit limit of 1.3 mg/L for four of the previous six months and also total suspended solids (TSS) have exceeded the monthly average permit limit of 25 mg/L for five of the previous six months, both of which have triggered Significant Non-Compliance in EPA's ICIS data management system. This has been addressed under separate cover with a Notice of Violation (NOV) dated February 10, 2009.

REQUIREMENTS

- 1. Continue implementing your corrective action plan as we discussed to treat the mine water for excessive total iron and TSS concentrations.
- 2. With the recent NOV issued, please respond within 30 days as required and contact DWQ with any questions that you may have.
- 3. Continue to inform DWQ with updates of your corrective action plans as we discussed to eliminate the coal fines in the mine water discharge and along the stream channel downstream of Outfall 002.

PHOTO LOG West Ridge Resources Coal Mine (UT0025640) 2-3-2009

Photo #1: View of discharging effluent outfall 001.

Photo #2: Looking downstream from outfall 001.

Photo #3: Sedimentation pond & outfall 002, facing southwest.

Photo #4: View of discharging effluent in "C" Canyon Drainage, just outside the

main entrance gate.

Photo #5: View of coal mine operations from main office building, facing northeast.

END (Photos taken by J. Studenka)

West Ridge Mine 2-3-2009

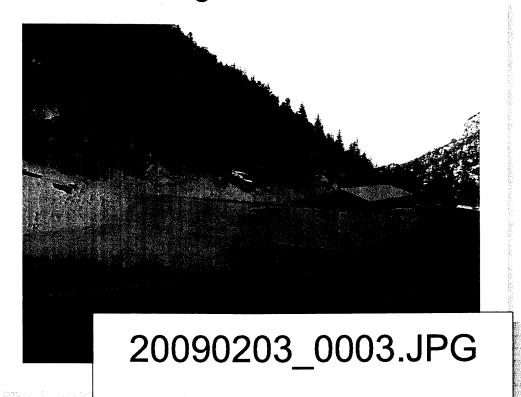


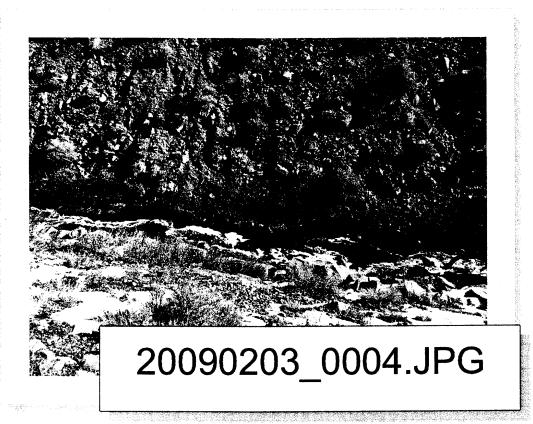
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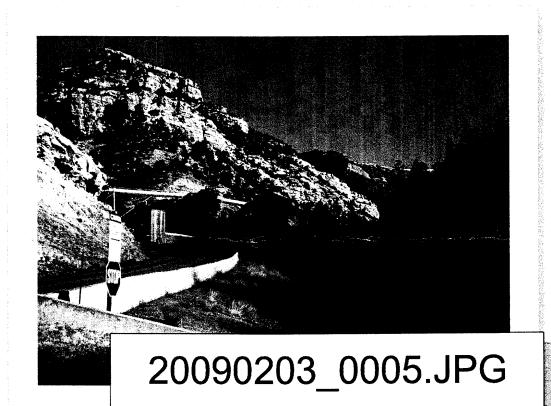
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West Ridge Mine 2-3-2009





West Ridge Mine 2-3-2009





United States Environmental Protection Agency Washington, D.C. 20460

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Crandall Canyon Mine (a.k.a. Genwal Resources, Inc.) UtahAmerican Energy, Inc.	<u> </u>					
~1.5 miles up Crandall Canyon off Hwy. 31 in Huntington Canyon		Exit Time/ Date	Permit Expiration Date			
NW of Huntington, UT		12:45 pm/2-3-2009	11-30-2010			
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N. All CD H. OST LET'LED		SEE ATTACHED				
Name, Address of Responsible Official/Title/Phone and Fax Number Bruce Hill, President	Contacted	·				
UtahAmerican Energy, Inc. P.O. Box 1077						
Price, UT 84501	Yes No		•			
(435) 888-4008		-				
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NEIC Inspectors

IU Inspection with Pretreatment Audit

Joint EPA/State Inspectors—EPA Lead

Local Health Department (State)

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United States Environmental Protection Agency Washington, D.C. 20460

Section A: Nation	al Data System Coding (i.e., l	(CIS)			
Transaction Code NPDES U T 0 0 2 4 3 6 8 11	yr/mo/day 0 9 0 2 0 3 12 Remarks	Inspection Typ	e Inspector Fac. Type S 19 20		
21			66		
Inspection Work Days Facility Self-Monitoring Evaluation Rating 4 70	BI QA N 71 72	73 74	Reserved		
	ion B: Facility Data	13 /4	13 60		
Name and Location of Facility Inspected (For industrial users discharging to		Entry Time/ Date	Permit Effective Date		
and NPDES permit number) Crandall Canyon Mine (a.k.a. Genwal Resources, Inc.)		12:00 pm/2-3-2009	12-1-2005		
UtahAmerican Energy, Inc.		Exit Time/ Date	Permit Expiration Date		
~1.5 miles up Crandall Canyon off Hwy. 31 in Huntington Canyon NW of Huntington, UT		12:45 pm/2-3-2009	11-30-2010		
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)		Other Facility Data (e.g.	, SIC NAICS, and other		
Karla Knoop, Hydrologist & Authorized Agent, jbr Environmental Consult	ants, Inc.	descriptive information)	erground Mining Facility		
phone (435) 637-9645, fax (435) 637-8679		SIC Code 1222 NAICS 212112	Aground Minning Pacifity		
Name Address of Bossos ikke Official Title Title		SEE ATTACHED			
Name, Address of Responsible Official/Title/Phone and Fax Number Bruce Hill, President	Contacted				
UtahAmerican Energy, Inc. P.O. Box 1077					
Price, UT 84501	Yes No				
(435) 888-4008					
Santian Call Building	- T	000 000			
Section C: Areas Evaluated Dur		ose areus evaiuatea)			
Permit Self Monitoring Progra Records/Reports Compliance Schedule	m Pretreatment Pollution Prever	L	MS4		
	 	HOH			
Effluent/Receiving Waters Operations & Maintena					
Flow Measurement Sludge Handling/Dispo					
	mmary of Findings/Commen				
(Attach additional sheets of narrative and ch			s necessary)		
SEV Codes SEV Description					
		•			
Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numb	per(s)	Date:		
JEFF STUDENKA, ENVIRONMENTAL SCIENTIST	DWQ (801) 538-6779		2-13-08		
2 40 Date:					
		·			
Name and Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numb	per(s)	Date:		
MIKE HERKIMER, MANAGER UPDES IES SECTION MIKE SERVINGER UPDES IES SECTION	DWQ (801) 538-6058		2/18/09		
EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete					

Section A: National Data System Coding (i.e., ICIS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be new unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

- A Performance Audit
 B Compliance Biomonitoring
 C Compliance Evaluation (non-sampling)
 D Diagnostic
 F Pretreatment (Follow-up)
 G Pretreatment (Audit)
 I Industrial Liquid (III) Increasion
- I Industrial User (IU) Inspection
 J Complaints
 M Multimedia
 N Spill
- O Compliance Evaluation (Oversight)
 P Pretreatment Compliance Inspection
 R Recognaissance
- R Reconnaissance S Compliance Sampling
- U IU Inspection with Pretreatment Audit

- X Toxics Inspection
 - Z Sludge Biosolids
 # Combined Sewer Overflow-Sampling
- \$ Combined Sewer Overflow-Non-Sampling
- + Sanitary Sewer Overflow-Sampling & Sanitary Sewer Overflow-Non-Sampling
- CAFO-Sampling
 CAFO-Non-Sampling
 IU Sampling Inspection
 IU Non-Sampling Inspection
- IU Toxics Inspection
 U Sampling Inspection with
 Pretreatment

- 6 IU Non-Sampling Inspection with Pretreatment
- IU Toxics with Pretreatment
- ! Pretreatment Compliance (Oversight)@ Follow-up (enforcement)
- { Storm Water-Construction-Sampling
- Storm Water-Construction-Non-Sampling
- : Storm Water-Non-Construction-Sampling
- ~ Storm Water-Non-Construction-
- Non-Sampling

 Storm Water-MS4-Sampling
- Storm Water-MS4-Sampling
 Storm Water-MS4-Non-Sampling
- > Storm Water-MS4-Audit

Column 19: Inspector Code. Use one of the codes listed below to describe the lead agency in the inspection.

- A- State (Contractor) O- Other Inspectors, Federal/EPA (Specify in Remarks columns)
 B- EPA (Contractor) P- Other Inspectors, State (Specify in Remarks columns)
- E- Corps of Engineers R- EPA Regional Inspector
 J- Joint EPA/State Inspector—EPA Lead S- State Inspector
- Joint EPA/State Inspectors—EPA Lead S- State Inspector
 Local Health Department (State)
 T- Joint State/EPA Inspectors—State lea
 N- NEIC Inspectors

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1- Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2- Industrial. Other than municipal, agricultural, and Federal facilities.
- 3- Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4- Federal. Facilities identified as Federal by the EPA Regional Office.
- 5- Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

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INSPECTION PROTOCOL

UPDES Permit #: UT0024368 – Genwal Resources Crandall Canyon Mine

Inspection Type: Reconnaissance Inspection + Compliance Sampling Inspection

Inspection Date: February 3, 2009

Weather Conditions: Sunny and mild, ~ 40 °F.

Jeff Studenka of the Division of Water Quality (DWQ) visited the UtahAmerian Energy, Inc., Crandall Canyon Mine Facility (a.k.a. Genwal Resources, Inc.) and met with Karla Knoop, authorized agent for the facility. The purpose for the site visit was to perform reconnaissance and compliance sampling inspections as a result of recent elevated total iron concentrations in the mine water discharge.

FACILITY DESCRIPTION

<u>Location</u>: Within Manti-LaSal National Forest, approximately 1.5 miles up Crandall Canyon,

off Hwy. 31 in Huntington Canyon, near Huntington, Utah

Coordinates: Outfall 001 – 39° 27' 38" latitude, -111° 09' 38" longitude

Outfall 002 – 39° 27' 38" latitude, -111° 09' 59" longitude

Average Flow: ~ 0.8 MGD (Outfall 002)

Receiving water: Crandall Creek to Huntington Creek

<u>Process</u>: Former underground coal mining operation. Water from the inactive mine is gravity conveyed to below ground settling areas, where it is then piped out of the mine and discharged to the Crandall Creek culvert (Outfall 002). Surface water is conveyed to an above ground settling pond with a discharge point (Outfall 001) to Crandall Creek.

INSPECTION SUMMARY

There were no deficiencies noted during the last inspection for follow up. This inspection was limited to outside the mine where the water collection and distribution systems are exposed. At the time of the inspection, the sedimentation pond contained a considerable amount of ice and snow, but was well below discharge levels. The outfall locations were observed as well as the receiving waters of Crandall Creek, which was flowing mostly clear and steady at the time of the inspection, however some rust-colored deposits were observed immediately adjacent to the Crandall Canyon culvert and Outfall 002, which is likely from the elevated iron in the effluent discharge. As planned, DWQ collected discharge compliance grab samples @ 12:10 pm from Outfall 002 for TDS, TSS, total iron, and oil & grease parameters and the results will be compared to the February 2009 DMR as soon as both are available. Photos were also collected and are attached herein with a photo log.

DEFICIENCIES

Numeric effluent concentrations for total iron have exceeded the permit limit of 1.3 mg/L for four of the previous six months, which has triggered Significant Non-Compliance in EPA's ICIS data management system. This is being addressed under separate cover with a Notice of Violation (NOV), as required.

REQUIREMENTS

- 1. Continue implementing your corrective action plan as we discussed to treat the mine water for excessive total iron concentrations and keep DWQ informed of your progress.
- 2. Upon receipt of the forthcoming NOV, please respond within 30 days as required and contact DWQ with any questions that you may have.

PHOTO LOG West Ridge Resources Coal Mine (UT0025640) 2-3-2009

Photo #1: Partial view of sedimentation pond former coal mine operations, facing

west.

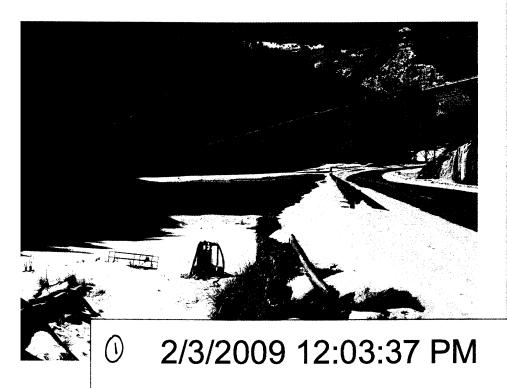
Photo #2: View of discharging effluent into Crandall Canyon Creek.

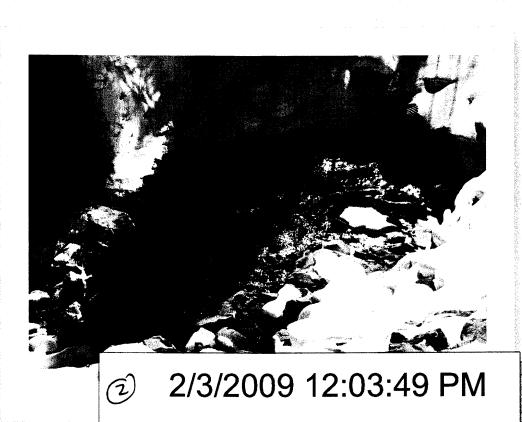
Photo #3: View of former coal mine operations, facing west.

Photo #4: View of mine water discharge sampling station, facing east.

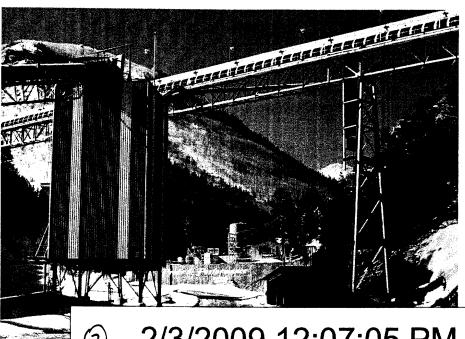
END (Photos taken by J. Studenka)

Crandall Canyon Mine 2-3-2009

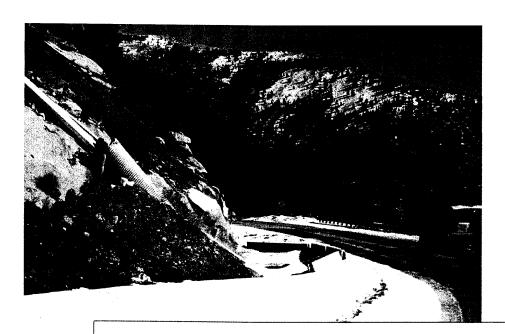




Crandall Canyon Mine 2-3-2009



2/3/2009 12:07:05 PM



2/3/2009 12:22:59 PM